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July 11, 2013

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: Ex Parte Notice

Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268;
Policies Regarding Mobile Spectrum Holdings, GN Docket No. 12-269

Dear Ms. Dortch:

On July 9, 2013, Tim Donovan of the Competitive Carriers Association; Richard Engelman of Sprint Nextel Corporation; Kathleen Ham and Chris Wieczorek of T-Mobile USA, Inc.; Carri Bennet of the Rural Telecommunications Group, Inc.; Alison Minea of Dish Network Corporation; Gigi Sohn of Public Knowledge; and Catherine Sloan of the Computer & Communications Industry Association met with David Goldman, Senior Legal Advisor to Commissioner Jessica Rosenworcel.

The group represents a coalition of trade associations, competitive carriers, and public interest organizations that seek to promote competition in the upcoming 600 MHz spectrum auction. The group supports the Department of Justice recommendations for reasonable spectrum-aggregation limits to ensure dominant market participants do not foreclose competitors from valuable lower-band spectrum.

Representatives spoke to the attached slides. Some participants noted that no one seeks to bar AT&T and Verizon from the auction, even though they control more than 80 percent of all lower band holdings today. Some participants also noted that dominant carriers with large low-frequency holdings often tout the competitive advantages of lower-band spectrum.¹

Other representatives added that reasonable limits could be adopted that would foster robust long-term competition while encouraging higher auction revenues. Some participants explained that a clear, *ex ante* spectrum-aggregation limit will promote investment and innovation, enhance consumer choice, and create the potential for higher auction revenue.

¹ For example, a recent television commercial aired by one of the dominant incumbents highlights the competitive advantage of low band spectrum in providing superior coverage “indoors and out[doors].” See <http://www.youtube.com/watch?v=qWADLGvli6w>.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, an electronic copy of this letter is being filed in the above-referenced docket. Kindly direct any questions regarding this filing to the undersigned.

Respectfully submitted,

/s/ Trey Hanbury

Trey Hanbury
Counsel to T-Mobile USA, Inc.

cc: David Goldman (via e-mail)
Attachment